

EDWARDS WILDMAN PALMER LLP  
Rory J. McEvoy  
Julie L. Weber  
Attorneys for Defendants  
750 Lexington Avenue  
New York, New York 10022  
212.308.4411  
rmcevoy@edwardswildman.com  
jlweber@edwardswildman.com

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

LEENA VARUGHESE, M.D.,

Plaintiff,

v.

MOUNT SINAI MEDICAL CENTER, PATRICK  
LENTO, M.D., CARLOS CORDON-CARDO, M.D.,  
ADOLFO FIRPO, M.D., IRA J. BLEIWEISS, M.D., and  
ABC Corp. 1-10, and JOHN DOES 1-10,

Defendants.

---

12 Civ. 8812 (CM) (JCF)

**DECLARATION OF  
RORY J. MCEVOY**

RORY J. MCEVOY, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury that the following is true and correct:

1. I am a member of the firm of Edwards Wildman Palmer LLP; attorneys for Defendants The Mount Sinai Medical Center (“Mount Sinai”), Dr. Patrick Lento, Dr. Carlos Cordon-Cardo, Dr. Adolfo Firpo, and Dr. Ira Bleiweiss (collectively “Defendants”) and I am fully familiar with this proceeding as well as the specific matters set forth herein. I make this declaration in support of Defendants’ motion for summary judgment.

2. Exhibit 1 hereto is a copy of relevant excerpts and exhibits from the deposition transcripts of Plaintiff Dr. Leena Varughese (“Plaintiff”), which I conducted on May 23, 2013, June 11, 2013, June 13, 2013, July 8, 2013 and August 7, 2013.

3. Exhibit 2 hereto is a copy of relevant excerpts and exhibits from the deposition transcript of Dr. Carlos Cordon-Cardo, which I defended on October 18, 2013.

4. Exhibit 3 hereto is a copy of relevant excerpts and exhibits from the deposition transcript of Dr. Patrick Lento, which I defended on October 25, 2013.

5. Exhibit 4 hereto is a copy of relevant excerpts and exhibits from the deposition transcript of Dr. Ira Bleiweiss, which I defended on November 13, 2013.

6. Exhibit 5 hereto is a copy of relevant excerpts and exhibits from the deposition transcript of Dr. Arthur Figur, which I defended on January 8, 2014.

7. Exhibit 6 hereto is a copy of relevant excerpts and exhibits from the deposition transcript of Dr. Adolfo Firpo, which my Partner, Ira Greenberg, defended on October 30, 2013 and December 17, 2013.

8. Exhibit 7 hereto is a copy of relevant excerpts and exhibits from the deposition transcript of Shema Patel, which my Partner, Ira Greenberg, defended on November 20, 2013.

9. Exhibit 8 hereto is a copy of relevant excerpts and exhibits from the deposition transcript of Caryn Tiger-Paillex, which my Partner, Ira Greenberg, defended on December 17, 2013.

Dated: New York, New York  
July 24, 2014



Rory J. McEvoy